

From: [Hall, Samuel C.](#)
To: [kmotley@motleylegal.com](#); [Meyer, Brianna J.](#); [McGaver, Steven C.](#); [Nathaniel Cade](#); [Antonique Williams](#); [Annalisa Pusick](#)
Subject: RE: Motion for Leave to Amend - Justin Blake
Date: Sunday, March 05, 2023 2:13:54 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[biocc_93785f5f-ed97-44c3-b4d6-5b1caa34746d.png](#)
[vcardcc_043e3bb0-e5e2-4373-8ce7-c0d94f1c7161.png](#)
[ccclear_34872598-c773-474b-a10a-fafc8807566f.png](#)

Hi Kim,

The proper insurance company is: Wisconsin Municipal Mutual Insurance Company.

Thanks,
Sam

Samuel C. Hall, Jr. | Managing Partner

SHall@CrivelloCarlson.com
Direct: 414-290-7587



Crivello Carlson, S.C.

710 North Plankinton Avenue
Suite 500
Milwaukee, Wisconsin 53203
Main: 414-271-7722
Fax: 414-271-4438
www.crivellocarlson.com

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From: kmotley@motleylegal.com <kmotley@motleylegal.com>

Sent: Thursday, March 2, 2023 2:47 PM

To: Hall, Samuel C. <SHall@CrivelloCarlson.com>; Meyer, Brianna J. <BMeyer@crivellocarlson.com>; McGaver, Steven C. <SMcGaver@CrivelloCarlson.com>; Nathaniel Cade <nate@cade-law.com>; Antonique Williams <antonique@cade-law.com>; Annalisa Pusick <annalisa@cade-law.com>

Subject: Re: Motion for Leave to Amend - Justin Blake

Hello Sam,

Certainly, if the insurance for the County that we named is incorrect we would like to correct that as well. If you could please provide that information I would greatly appreciate it. Thanks.

Kim

From: Hall, Samuel C. <SHall@CrivelloCarlson.com>

Sent: Thursday, March 2, 2023 3:43 PM

To: kmotley@motleylegal.com <kmotley@motleylegal.com>; Meyer, Brianna J. <BMeyer@crivellocarlson.com>; McGaver, Steven C. <SMcGaver@CrivelloCarlson.com>; Nathaniel Cade <nate@cade-law.com>; Antonique Williams <antonique@cade-law.com>; Annalisa Pusick <annalisa@cade-law.com>

Subject: RE: Motion for Leave to Amend - Justin Blake

Kim,

Will you also be naming the correct insurance carrier for the County?

Thanks

Sam

Samuel C. Hall, Jr. | Managing Partner

SHall@CrivelloCarlson.com

Direct: 414-290-7587



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From: kmotley@motleylegal.com <kmotley@motleylegal.com>

Sent: Thursday, March 02, 2023 2:29 PM

To: Hall, Samuel C. <SHall@CrivelloCarlson.com>; Meyer, Brianna J. <BMeyer@crivellocarlson.com>; McGaver, Steven C. <SMcGaver@CrivelloCarlson.com>; Nathaniel Cade <nate@cade-law.com>; Antonique Williams <antonique@cade-law.com>; Annalisa Pusick <annalisa@cade-law.com>

Subject: Motion for Leave to Amend - Justin Blake

Hello Brianna, Samuel, and Steven,

It has come to our attention that NaphCare was not the medical service provider of the Kenosha Secure Detention nor the employer of Bergmann on April 25, 2021 when Mr. Blake was arrested. We plan to file a motion for leave to amend our complaint filed on 2/15/23 and replace NaphCare with the appropriate Defendants. I am reaching out to see if you would object to our motion. We do not plan to make any other substantive changes to the complaint and only plan to name the appropriate parties.

Please let me know your thoughts as we would like to file this soon. Thank you!

--

Best,

Kim

Kimberley Cy Motley, Esq.

C.E.O. / Founding Partner
Motley Legal Services
Afghan Mobile : 93 (0) 788 887 887
Intl. Number : 1 (704) 765 - 4887
US Mobile : 1 (704) 763-5413
motleylegal.com

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